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Lead Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master No.: 3:07-cv-05944-SC
MDL No. 1917

This Document Relates to:

ALL INDIRECT-PURCHASER ACTIONS

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
Case No. 3:11-cv-05513

Best Buy Co., Inc., et al. v. Technicolor SA, et al.,
Case No. 13-cv-05264

Costco Wholesale Corporation v. Hitachi, Ltd., et
al., No. 11-cv-06397

Costco Wholesale Corporation v. Technicolor SA,
et al., No. 13-cv-05723

Interbond Corp. of America v. Hitachi, Ltd., et al.,
Case No. 3:11-cv-06275

Interbond Corp. of America v. Technicolor SA, et
al., Case No. 3:13-cv-05727

Office Depot, Inc. v. Hitachi, Ltd., et al., Case No.
3:11-cv-06276

Office Depot, Inc. v. Technicolor SA, et al., Case
No. 3:13-cv-05726

**DECLARATION OF LAUREN
C. CAPURRO IN SUPPORT OF
PLAINTIFFS'
ADMINISTRATIVE MOTION
TO FILE DOCUMENTS
UNDER SEAL PURSUANT TO
CIVIL LOCAL RULES
7-11 AND 79-5**

Date: February 6, 2015
Time: 10:00 a.m.
Place: Courtroom 1

The Honorable Samuel Conti

1 *Sears, Roebuck and Co., & Kmart Corp. v.*
2 *Chunghwa Picture Tubes, Ltd., et al.*, No. 11-cv-
3 05514-SC

4 *Sears, Roebuck and Co. and Kmart Corp. v.*
5 *Technicolor SA*, No. 3:13-cv-05262

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am an associate with the law firm Trump, Alioto, Trump &
4 Prescott, LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs
5 (“Plaintiffs”) in the above-captioned action. I make this declaration in support of the
6 Plaintiffs’ Administrative Motion to File Under Seal Pursuant to Civ. L. R. 7-11 and 79-
7 5(d). Except where otherwise stated, the matters set forth herein are within my personal
8 knowledge and if called upon and sworn as a witness I could competently testify regarding
9 them.

10 2. On June 18, 2008, the Court approved a “Stipulated Protective Order” in
11 this matter (Dkt. No. 306) (the “Protective Order”).

12 3. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d),
13 Plaintiffs seek to file the following documents under seal:

14 a. The highlighted portions of Plaintiffs’ Opposition to Defendants’
15 Motion for Partial Summary Judgment on Indirect Purchaser Claims
16 Based on Foreign Sales;

17 b. The highlighted portions of the Declaration of Mario N. Alioto In
18 Support of Plaintiffs’ Opposition to Defendants’ Motion for Partial
19 Summary Judgment on Indirect Purchaser Claims Based on Foreign
20 Sales (the “Alioto Declaration”); and

21 c. Exhibits 2-17, 19-145, and 148 to the Alioto Declaration.

22 4. The documents or portions of documents that Plaintiffs seek to file under
23 seal contain either (a) material designated by Defendants pursuant to the Stipulated
24 Protective Order as “Confidential” or “Highly Confidential” or (b) analysis of, references
25 to, or information taken directly from material designated by Defendants pursuant to the
26 Stipulated Protective Order as “Confidential” or “Highly Confidential.”

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1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct. Executed this 23rd day of December, 2014 at San Francisco,
3 California.

4 /s/ Lauren C. Capurro

5 Lauren C. Capurro
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